

MORRIS LAW GROUP  
Ryan M. Lower, Bar No. 9108  
Email: rml@morrislawgroup.com  
Raleigh C. Thompson, Bar No.11296  
Email: rct@morrislawgroup.com  
900 Bank of America Plaza  
300 South Fourth Street  
Las Vegas, NV 89101  
Telephone: (702) 474-9400  
Facsimile: (702) 474-9422

Attorneys for Defendant  
PlusFour, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHAEL J. HANNON,

Plaintiff,

v.

NORTHEAST CREDIT &  
COLLECTIONS; PLUSFOUR, INC;  
CACH, LLC; JH PORTFOLIO DEBT  
EQUITIES LLC; AARGON AGENCY  
INC; COMMONWEALTH  
FINANCIAL SYSTEMS, INC; BANK  
OF AMERICA, NATIONAL  
ASSOCIATION; CIT BANK,  
NATIONAL ASSOCIATION;  
EQUIFAX INFORMATION  
SERVICES, LLC; EXPERIAN  
INFORMATION SOLUTIONS, INC;  
TRANS UNION, LLC,

Defendants.

Case No. 2:16-cv-01814-APG-VCF

**STIPULATION AND ORDER  
TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

**(SECOND REQUEST)**

Pursuant to Local Rules IA 6-1(a), 6-2 and 7-1, and Federal Rule  
of Civil Procedure 6(b), Defendant PlusFour, Inc. ("Defendant") and Plaintiff  
Michael Hannon ("Plaintiff"), by and through their respective counsel of  
record, hereby stipulate as follows:

The parties have agreed to an extension of the time for Defendant to respond to Plaintiff's Complaint (ECF No. 1, filed on July 29, 2016) to October 4, 2016.

Rule 6(b) requires the Court to approve an extension of time for Defendant to file an answer, and therefore the Parties collectively request the Court approve the agreement, as set forth below:

a. This is the Parties' second stipulation for an enlargement of time to respond to the Complaint;

b. The Parties stipulate and agree that the deadline for Defendant to file an answer or otherwise respond to Plaintiff's Complaint shall be extended to on or before October 4, 2016; and

c. The parties agreed to this extension as they have engaged in discussions concerning a potential resolution of this matter, and would like to allow themselves sufficient time to meaningfully examine and discuss that possibility. This stipulation is not made for purposes of delay.

Date: 9/12/2016

Date: 9/12/2016

KNEPPER & CLARK LLC

MORRIS LAW GROUP

By: /s/Matthew I. Knepper  
 Matthew I. Knepper, Bar No. 12796  
 Miles N. Clark, Bar No. 13848  
 10040 W. Cheyenne Ave.  
 Ste. 170-109  
 Las Vegas, Nevada 89129

By: /s/Raleigh C. Thompson  
 Ryan M. Lower, Bar No. 9108  
 Raleigh C. Thompson, Bar No.  
 11296  
 900 Bank Of America Plaza  
 300 South Fourth Street  
 Las Vegas, Nevada 89101

Attorneys for Plaintiff  
 Michael Hannon

Attorneys for Defendant  
 PlusFour, Inc.

PlusFour, Inc. was dismissed on September 17, 2016 (ECF No. 25) This stipulation is  
**DENIED** as moot.

**ORDER**

IT IS SO ORDERED.

  
 UNITED STATES MAGISTRATE JUDGE  
 DATED: September 22, 2016